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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BIG ROCK ASSETS MANAGEMENT LLC, a
Nevada limited liability company,

Plaintiff,

v.

NATIONAL DEFAULT SERVICING
CORPORATION, BANK OF AMERICA, N.A.,
a national association; DOES I through X,
inclusive,

Defendants.

Case No.: 2:22-cv-00909-CDS-DJA

**STIPULATION AND ORDER FOR
EXTENSION OF TIME TO
RESPOND TO COMPLAINT**

(THIRD REQUEST)

Big Rock Assets Management, LLC and Bank of America, N.A. (**BANA**) stipulate that BANA shall have an additional thirty (30) days, up to and including **September 12, 2022**, to file its response to Big Rock's complaint, which is currently due on August 11, 2022.

Good cause exists to grant the requested extension since the parties are engaged in settlement negotiations with respect to this case and another pending in the court. *See Big Rock Asserts Mgmt., LLC v. MTC Financial Inc.*, No. 2:22-cv-1212-APG-NJK. The foreclosure sale related to the sister case is scheduled on September 7, 2022. The parties are attempting to reach a global settlement prior to the foreclosure sale. Incurring fees related to a response could impact a potential settlement.

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This is the parties' third request for an extension of this deadline and is not intended to cause any delay or prejudice to any party.

DATED this 10th day of August, 2022.

AKERMAN LLP	ANDREW BAO & ASSOCIATES
<u>/s/ Scott R. Lachman</u> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134 Attorneys for Bank of America, N.A.	<u>/s/ Andrew A. Bao</u> ANDREW A. BAO, ESQ. Nevada Bar No. 10508 8020 S. Rainbow Boulevard, Suite 100-163 Las Vegas, NV 89139 Attorneys for Big Rock Assets Management, LLC

IT IS SO ORDERED.



UNITED STATES MAGISTRATE JUDGE
Case No.: 2:22-cv-00909-CDS-DJA

DATED: August 15, 2022

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